

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

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ABIGAIL DOOLITTLE, : Case No. 22-cv-09136 (JLR)  
 :  
 *Plaintiff,* :  
 :  
 v. :  
 :  
 BLOOMBERG L.P. and MARK CRUMPTON, :  
 :  
 *Defendants.* :  
-----X  
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**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 25(c), upon the accompanying Memorandum of Law, and Declarations of Anna Aguilar, Dr. Mamatha Gadarla, Dr. Edward Vecchione, and Steve Crumpton, Defendant Mark Crumpton, shall move this Court, before the Honorable Jennifer L. Rochon, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, on **the 3rd day of May, 2024, at 10 a.m.** or as soon thereafter as counsel may be heard, for entry of a protective order prohibiting an oral deposition of Defendant Mark Crumpton at this time, staying the case (with the exception of expert discovery, which shall proceed), and delaying a briefing schedule for summary judgment motions, for a period of six (6) months.

Dated: New York, NY  
April 12, 2024

Per Local Civil Rule 6.1, opposition to motions under Fed. R. Civ. P. 26 is due seven days after service of the original motion. Defendant Crumpton moved for a protective order on April 12, 2024. Plaintiff has not responded to the motion. By April 23, 2024, Plaintiff shall advise the Court as to whether she opposes the motion and file her opposition if any. Otherwise, the Court will consider the motion unopposed.


AGUILAR BENTLEY LLC

By: /s/ Anna Aguilar  
Anna Aguilar

5 Penn Plaza, 19<sup>th</sup> Floor  
New York, New York 10001  
(212) 835-1521

**SO ORDERED.**

Dated: April 22, 2024  
New York, New York

  
JENNIFER L. ROCHON  
United States District Judge

[aaguilar@aguilarbentley.com](mailto:aaguilar@aguilarbentley.com)

*Attorneys for Defendant Mark  
Crumpton*